

M-11-297

JAP:UAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

VICTOR MOBI UKEH,

Defendant.

PRE-ARRAIGNMENT

COMPLAINT

(21 U.S.C. §§ 952(a)
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JAMES HOLT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about March 22, 2011, within the Eastern District of New York and elsewhere, defendant VICTOR MOBI UKEH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On March 22, 2011, defendant VICTOR MOBI UKEH, a citizen of Nigeria, arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Turkish Airlines flight no. 1 from Istanbul, Turkey.

2. During an enforcement examination by Customs and Border Protection ("CBP") officers, UKEH stated that he was on his way to the United States to buy cars for export. However, he had only \$1,630.00 on him and could not answer questions as to where he was planning on purchasing or shipping the cars. He was also traveling on a ticket purchased in cash the day before travel.

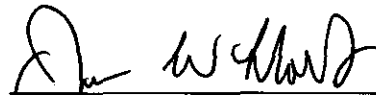
3. Based on these facts, CBP officers performed a pat down inspection of UKEH, which was negative. The defendant appeared extremely nervous. He was then presented with an x-ray consent form which he said he understood and signed.

4. UKEH was transported to the medical facility at JFK, and an x-ray was taken of his intestinal tract. The x-ray was positive for foreign bodies. UKEH initially passed nine (9) pellets, one of which field-tested positive for heroin.

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. UKEH will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant VICTOR MOBI UKEH be dealt with according to law.



JAMES HOLT
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
23rd day of March, 2011

Y
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NEW YORK